

WIGDOR.

Jeanne M. Christensen

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May 22, 2025

MEMO ENDORSED

VIA ECF

The Honorable Jessica G.L. Clarke
United States District Court
Southern District of New York
500 Pearl St., Courtroom 11B
New York, NY 10007

Re: Parker v. Bursor et al., Civil Case No.: 1:24-cv-00245-JGLC-RFT

Dear Judge Clarke:

We represent Plaintiff in the above-captioned action. On March 8, 2025, Defendants filed a Counterclaim, naming Plaintiff, as well as four new parties, as counter-defendants. ECF 390. The Counterclaim is 79 pages long and contains 424 numbered paragraphs of allegations and eleven causes of action.

We write to request an extension of time for Plaintiff to answer or otherwise move with respect to Defendants' Counterclaim. The current deadline is May 29, 2025. This is due to the length of the Counterclaim, as well as the fact that Defendants have not yet completed service on all other counter-defendants. Each counter-defendant will also need to answer or otherwise move with respect to the Counterclaim as well, so there is no undue delay or prejudice in granting Plaintiff's request for an extension.

Plaintiff requests an extension through **June 26, 2025**, an additional 28 days, to answer or otherwise move with respect to Defendants' Counterclaim. Defendants consent to this extension. This is Plaintiff's first request for an extension of this deadline, and it does not affect any other scheduled deadlines.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

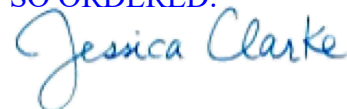


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Cc: All counsel of record *via* ECF

Application GRANTED. Plaintiff to respond to counterclaim by **June 26, 2025**. The Clerk of Court is directed to terminate ECF No. 416.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: May 27, 2025
New York, New York